

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>8/21/2025</u>

LETTER MOTION FOR LEAVE TO REFILE MOTION FOR TEMPORARY RESTRAINING ORDER WITH CORRECTED DOCUMENT QUALITY

Dear Judge Vyskocil:

I respectfully request leave to refile my Motion for Temporary Restraining Order (Document 72, filed July 18, 2025) with corrected document quality to ensure proper judicial review.

Background

On July 18, 2025, I timely filed my Motion for Temporary Restraining Order or Injunction with supporting memorandum, declaration, and exhibits. While the filing was completed before the deadline, subsequent review reveals that significant portions of the document contain poor scan quality that materially imparedability and the Court's ability to properly review the substantive arguments and evidence presented.

Technical Issue Requiring Correction

The uploaded document suffers from scanning defects including:

- Blurred and illegible text in critical sections
- Poor contrast making portions unreadable
- Formatting issues that obscure legal arguments and factual allegations

These technical deficiencies prevent effective judicial review of the motion's merits, which seek urgent relief based on ongoing trademark infringement and federal database corruption affecting thousands of daily library system accesses. I was not able to see these defects prior to filing.

Request for Relief

I respectfully request leave to refile the Motion for Temporary Restraining Order with the same content but improved document quality that meets the Court's ECF standards for text-searchable, clearly readable documents under 10 megabytes.

No Prejudice to Defendant

This correction will not prejudice Defendant, as:

- The original filing was timely on July 18, 2025

- Defendant's response deadline is August 25, 2025, providing adequate time for review
- The substance and scope of the motion remain identical
- Only document clarity is being improved

Conclusion

Correcting the document quality serves judicial efficiency and ensures the Court can properly evaluate the urgent relief sought. The original timely filing preserves all procedural rights while this technical correction facilitates effective adjudication.

I respectfully request the Court grant leave to refile Document 72 with improved scan quality.

Thank you for your consideration.

Respectfully submitted,

/s/ Vickie M. Stringer

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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2025 I served a true and correct copy of the foregoing Letter Motion upon counsel for Defendant through the Court's Electronic Case Filing (ECF) system:

Reginald Janvier, Esq.
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(Counsel of Record for Defendant)

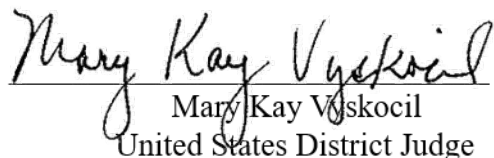
/s/ Vickie M. Stringer

Vickie M. Stringer, Pro Se

GRANTED. IT IS HEREBY ORDERED that by August 22, 2025, Plaintiff shall refile her motion at document number 72. The refiled motion shall not include any changes to the original motion but for the improved image quality.

SO ORDERED.

Date: August 21, 2025
New York, New York


Mary Kay Vyskocil
United States District Judge